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Cooperating attorneys on behalf of the
ACLU Foundation of Oregon, Inc.

Attorneys for Plaintiffs Rummell, West, Chickadonz, Tanner, and Basic Rights Education Fund

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION**

PAUL RUMMELL and BENJAMIN WEST;
LISA CHICKADONZ and CHRISTINE TANNER;
BASIC RIGHTS EDUCATION FUND,

Plaintiffs,

v.

JOHN KITZHABER, in his official
capacity as Governor of Oregon; ELLEN
ROSENBLUM, in her official capacity as Attorney
General of Oregon; JENNIFER WOODWARD, in
her official capacity as State Registrar, Center for
Health Statistics, Oregon Health Authority, and
RANDY WALRUFF, in his official capacity as
Multnomah County Assessor,

Defendants.

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No. 6:13-cv-02256-MC

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
PETITION FOR ATTORNEYS'
FEES AND COSTS**

By Plaintiffs Paul Rummell,
Benjamin West, Lisa Chickadonz,
Christine Tanner, and
Basic Rights Education Fund

DEANNA L. GEIGER and JANINE M.
NELSON; ROBERT DUEHMIG and
WILLIAM GRIESAR,

No. 6:13-cv-01834-MC

Plaintiffs,

v.

JOHN KITZHABER, in his official
capacity as Governor of Oregon; ELLEN
ROSENBLUM, in her official capacity as Attorney
General of Oregon; JENNIFER WOODWARD, in
her official capacity as State Registrar, Center for
Health Statistics, Oregon Health Authority, and
RANDY WALRUFF, in his official capacity as
Multnomah County Assessor,

Defendants.

CONFERRAL CERTIFICATION

Misha Isaak, counsel for plaintiffs Paul Rummell, Benjamin West, Lisa Chickadonz, Christine Tanner, and Basic Rights Education Fund, conferred in good faith about this motion with Lea Ann Easton, counsel for plaintiffs Deanna Geiger, Janine Nelson, Robert Duehmig and William Griesar; Sheila Potter, counsel for defendants John Kitzhaber, Ellen Rosenblum, and Jennifer Woodward; and Katharine von Ter Stegge, counsel for defendant Randy Walruff. The motion is unopposed.

MOTION

On June 2, 2014, the Court granted Plaintiffs' Joint Motion for Extension of Time to File Petition for Attorney Fees, setting a deadline of June 17, 2014. On June 19, the Court granted an Unopposed Motion for Extension of Time to File Petition for Attorneys' Fees and Costs by plaintiffs Paul Rummell, Benjamin West, Lisa Chickadonz, Christine Tanner, and Basic Rights Education Fund (collectively, the "Rummell plaintiffs"), resetting the deadline to July 1, 2014. The Rummell plaintiffs respectfully request an additional 14 day extension of time to file their

petition for attorney fees and costs. Granting this motion for extension of time would make the Rummell plaintiffs' petition for fees and costs due by July 15, 2014.

There is good cause for this motion. Counsel for the Rummell plaintiffs are negotiating a settlement of their petition for attorney fees and costs with counsel for defendants John Kitzhaver, Ellen Rosenblum, and Jennifer Woodward (the "State defendants"). If a settlement is reached, the Rummell plaintiffs will not need to burden this Court with deciding a contested fee petition. Counsel for the Rummell plaintiffs and the State defendants require an additional two weeks to determine whether a settlement is possible.

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As the Court knows, all counsel have worked diligently, effectively, and cooperatively in this matter, and this motion is unopposed. This extension of time, if granted, will have no impact on other existing deadlines.

DATED: July 1, 2014

s/ Misha Isaak

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